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*Counsel for Plaintiff, Marlena Sonn*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MARLENA SONN,

*Plaintiff,*

v.

KENDALLE P. GETTY, as Trustee of the  
Pleiades Trust and as an individual, KPG  
INVESTMENTS INC., as Trustee of the  
Pleiades Trust, ALEXANDRA SARAH  
GETTY, as Trustee of the Pleiades Trust and as  
an individual, ASG INVESTMENTS INC., as  
Trustee of the Pleiades Trust, MINERVA  
OFFICE MANAGEMENT, INC., and  
ROBERT L. LEBERMAN,

*Defendants.*

Case No.'s:

2:22-cv-01137-APG-BNW

3:22-cv-00323-ART-CLB

3:22-cv-00236-ART-CLB

(Consolidated)

**PLAINTIFF MARLENA SONN'S  
RESPONSE TO MOTION FILED  
BY DEFENDANTS MINERVA  
OFFICE MANAGEMENT, INC.  
AND ROBERT L. LEBERMAN**

KPG INVESTMENTS INC. and  
KENDALLE P. GETTY,

*Plaintiffs,*

v.

MARLENA SONN,

*Defendants.*

1 Plaintiff Marlena Sonn (“Ms. Sonn”), by and through the undersigned counsel, hereby  
 2 submits this response to the motion filed by Defendants Minerva Office Management and Robert  
 3 L. Leberman on September 30, 2022 (ECF No. 26). Although Ms. Sonn has no position on that  
 4 motion, the following is offered to shed light on how the parties arrived at this juncture, where  
 5 the Court’s intervention is apparently being sought on a routine scheduling matter.

6 As background, Ms. Sonn originally filed suit against Defendants Kendalle P. Getty, KPG  
 7 Investments Inc., Alexandra Sarah Getty, ASG Investments Inc., Minerva Office Management,  
 8 Inc., and Robert L. Leberman (collectively, “the Getty Defendants”), on May 11, 2022 in the  
 9 U.S. District Court for the Eastern District of New York, *see Sonn v. Getty, et al.* (E.D.N.Y. Case  
 10 No. 1:22-cv-02758), and then agreed to a voluntary transfer of venue to this Court. As part of that  
 11 agreement, Ms. Sonn also consented to participating in mediation, at the Getty Defendants’  
 12 insistence, and agreed to a stay of the proceedings such that the Getty Defendants would be spared  
 13 from having to file a responsive pleading if the mediation was successful.

14 Now that the proceedings have been stayed, however, the Getty Defendants have  
 15 essentially refused to provide any dates on which they could all make themselves available to  
 16 participate in mediation. When Ms. Sonn provided only two dates in November on which she  
 17 could *not* be available, the Getty Defendants then insisted that those were the *only* dates on which  
 18 they were *all* available. In light of the Getty Defendants’ purported inability to proceed on *any*  
 19 other date, Ms. Sonn rearranged her schedule to be available on that date. Mr. Leberman now  
 20 claims to have a conflict on that date, but has not proposed any other alternate date on which he  
 21 and the other Defendants can proceed.

22 In sum, Ms. Sonn remains willing and ready to participate in the mediation process. In  
 23 order to do so, however, the Getty Defendants must be able to propose some dates on which they  
 24 are all available to participate as well.

25 Dated: October 6, 2022  
 26 New York, NY

Respectfully submitted,

POLLOCK COHEN LLP

27 By: /s/ Agatha M. Cole  
 28 Agatha M. Cole

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